

**Chantel Barrett**

---

**From:** Barak Cardenas <barak@cardenasislam.com>  
**Sent:** Wednesday, November 20, 2019 11:44 AM  
**To:** Chantel Barrett  
**Cc:** Nakano, Serene (USTP); McMahon, Michelle; NEWELL FUNDING\_ LLC\_BRONX MIRACLE GOSPEL TABERNACLE \_35118\_00001\_ E\_Mail  
**Subject:** Re: [EXTERNAL] RE: In re Bronx Miracle Gospel Tabernacle Word of Faith Ministries, Inc., Case No. 19-12447

*Good morning*

We request an opportunity to respond to Ms. McMahon's letter before we participate in a conference regarding this matter.

Thank you.

Barak Cardenas

On Wed, Nov 20, 2019 at 8:33 AM McMahon, Michelle <[mmcmahon@cullenanddykman.com](mailto:mmcmahon@cullenanddykman.com)> wrote:  
Thank you. I will coordinate with the other counsel and we will call chambers.

*The debtor should file  
a response by Nov. 22, 2019*  
*8mo  
1108J  
11/20/19*

Michelle

On Nov 20, 2019, at 7:48 AM, Chantel Barrett <[Chantel.Barrett@nysb.uscourts.gov](mailto:Chantel.Barrett@nysb.uscourts.gov)> wrote:

Please call chambers to schedule a conference.

---

**From:** McMahon, Michelle <[mmcmahon@cullenanddykman.com](mailto:mmcmahon@cullenanddykman.com)>  
**Sent:** Tuesday, November 19, 2019 3:56 PM  
**To:** NYSBml\_Bernstein's\_Chambers\_Staff <[berNSTein.chambers@nysb.uscourts.gov](mailto:berNSTein.chambers@nysb.uscourts.gov)>  
**Cc:** [barak@cardenasislam.com](mailto:barak@cardenasislam.com); Nakano, Serene (USTP) <[Serene.Nakano@usdoj.gov](mailto:Serene.Nakano@usdoj.gov)>; NEWELL FUNDING\_ LLC\_BRONX MIRACLE GOSPEL TABERNACLE \_35118\_00001\_ E\_Mail <[{F675473}.CLIENTS@imanage.cullenanddykman.com](mailto:{F675473}.CLIENTS@imanage.cullenanddykman.com)>; McMahon, Michelle <[mmcmahon@cullenanddykman.com](mailto:mmcmahon@cullenanddykman.com)>  
**Subject:** RE: In re Bronx Miracle Gospel Tabernacle Word of Faith Ministries, Inc., Case No. 19-12447

Judge Bernstein:

Newell Funding, LLC ("Newell") submits the attached letter requesting that the Court direct above-referenced debtor (the "Debtor") to comply with the Notice of Deposition issued by Newell and Order Granting Motion Of Newell Funding, LLC For Entry Of An Order Pursuant To Bankruptcy Rule 2004 [D.I. 30] or schedule a

conference to address the Debtor's failure to comply pursuant to Local Bankruptcy Rule 7007-1(b). This letter has also been filed on the docket and a hard copy will be delivered overnight to the Court.

Thank you in advance for your time and attention to this matter.

Sincerely,

Michelle

**Michelle McMahon**

Partner

**Cullen and Dykman LLP**

44 Wall Street

New York, New York 10005

T: 212.510.2296 | F: 212.825.1531 | C: 917.968.0070

E: [mmcmahon@CullenandDykman.com](mailto:mmcmahon@CullenandDykman.com)

**ATTORNEY-CLIENT PRIVILEGED COMMUNICATION - DO NOT FORWARD OR COPY - CONFIDENTIALITY NOTICE:** The contents of this e-mail message and any attachments are intended solely for the personal and confidential use of the recipient(s) named above. This communication is intended to be and to remain confidential and may be subject to applicable attorney/client and/or work product privileges. If you are not the intended recipient of this message, or if this message has been addressed to you in error, please immediately alert the sender by reply e-mail and then delete this message and its attachments.

--  
**Barak P. Cardenas, Esq.**

**CARDENAS ISLAM & ASSOCIATES PLLC**

**175-61 Hillside Avenue, Suite 302**

**Jamaica, New York 11432**

**Tel: 347-809-7810**

**Fax: 914-861-0099**

**IRS CIRCULAR 230 DISCLOSURE**

TO ENSURE COMPLIANCE WITH REQUIREMENTS IMPOSED BY THE INTERNAL REVENUE SERVICE, WE INFORM YOU THAT ANY U.S. FEDERAL TAX ADVICE CONTAINED IN THIS COMMUNICATION (INCLUDING ANY ATTACHMENTS) IS NOT INTENDED OR WRITTEN TO BE USED, AND CANNOT BE USED, FOR THE PURPOSE OF (I) AVOIDING PENALTIES UNDER THE INTERNAL REVENUE CODE OR (II) PROMOTING, MARKETING OR RECOMMENDING TO ANOTHER PARTY ANY TRANSACTION OR MATTER ADDRESSED HEREIN.

**CONFIDENTIALITY NOTICE**

THIS E-MAIL MESSAGE (AND ANY ATTACHMENTS HERETO) IS INTENDED ONLY FOR THE USE OF THE NAMED RECIPIENT(S) AND MAY CONTAIN LEGALLY PRIVILEGED ATTORNEY-CLIENT INFORMATION AND/OR CONFIDENTIAL OR PROPRIETARY INFORMATION, AND/OR MAY CONTAIN ATTORNEY WORK PRODUCT, THAT IS EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF YOU HAVE RECEIVED THIS MESSAGE IN ERROR OR YOU ARE NOT THE NAMED RECIPIENT(S), YOU MAY NOT REVIEW, DISSEMINATE, DISTRIBUTE OR COPY THIS MESSAGE (OR ANY ATTACHMENTS HERETO) AND WE REQUEST THAT YOU PLEASE IMMEDIATELY NOTIFY THE SENDER BY REPLY E-MAIL AND DELETE THIS E-MAIL MESSAGE AND ANY ATTACHMENTS FROM YOUR COMPUTER. THANK YOU.